## Comments on BLM WOPR Alternative 2

from Tonia Blum, Hal Palmer forestland owners, BLM neighbor, owners and operators of Big Bear Camp, a campground/retreat on this forest land.

## Dear men and women of BLM,

It is difficult to know where to begin comment on this proposal, as it is so obviously against your own documented and previously honored research.

My husband and I are developing a campground/retreat which is next to BLM property and adjacent to BLM property which is a late successional stand. We purchased the property and have written a Forest Management Stewardship Plan (sponsored by ODF,) with the intent of using the property for the promotion of recreation, forest-land increased appreciation and understanding of the natural world, as well as sustainable forest practices. One of our target populations is children as we want to instill these values in the next generation and all future generations.

But aside from our own personal attachment to achieving these goals, we are abhorred by your own neglect of the lengthy scientific research that has been done by BLM, ODF, USFS and many unaffiliated agencies and groups.

Here are some of the main points in response to your plan which have, over time, proved to be true and important to maintaining healthy forests, healthy watersheds, wildlife health and diversity.

1. This plan disregards research of the spotted owl recovery, coho salmon recovery.

Our little stream, Miller creek has been shown by 6 years of research by OFWS and independent scientists to be of such a healthy nature to support a healthy Coho rearing habitat which then supports the great Siulslaw watershed and salmon population. This would be destroyed if the adjacent BLM property were to be logged as described in this plan. Our property also falls under the ranges of two long term spotted owl nesting sites, which also would be destroyed by this plan. Our goal for the campground and our forest is to maintain and increase the habitat for these two species in particular.

- 2. This plan does not follow many years of research on endangered species carried out by yourselves, OFWS, USFS and many private entities interested in sustainable biological habitats and sustainable forests practices.
- 3. This plan disregards research of the water quality criteria for temperature and sedimentation critical for salmon habitat.

- 4. This plan disregards the research which shows that thinning existing stands is more productive to habitat improvement and fire prevention
- 5. This plan seems to oppose the approach that you gave agreed to in the Forest Management Act, the result being the alienation of the public, including foresters. (We are members of Small Woodlands Association as well as attending many OSU workshops and trainings, so we know how other private foresters feel about this.) Many folks will no longer trust BLM to stick to their own scientific findings as well as collaborate with other agencies and stake-holders regarding forest practices.
- 6. This plan will assuredly create long and difficult confrontation that will end in unhappy stake-holders and law suites, thus wasting money, which is what you say you are trying to generate. The plan goes against long term collaboration with all the stake-holders of healthy and sustainable forests: BLM, ODF, USDF, ODFW and the PUBLIC.
- 7. This plan fails to address the short term and long term consequences of the changes in management practices. (Attend to your own documented research, the Forest Management Act, the USFS model of stewardship and sustainable forests to see what these consequences might be.
- 8. This plans fails to follow and achieve the standards of the Endangered Species Act and the Clean Water Act.
- 9. This plan will minimize biodiversity by creating even aged stands and increased herbicide use which will suppress native plants, shrubs, trees. and animals. All forest agencies have recognized biodiversity to be critical for present and future healthy forests. You will be creating more opportunity for catastrophic fires, insect and fungal disease.
- 10. And lastly, the excuse given for this change in practice is that it will provide funds for public services. It will in the VERY short run, and after these stands are logged, then what? I'm not against public services, in fact I would pay more taxes to support this. But the reality of a long term financial benefit is totally false. Funds will be generated for the short term (maybe a few decades at most), yes, but the long term devastating results to all of the above is not worth it. How will your children and their children feel about this destruction?

BLM, Have you no decency?

Sincerely, Tonia Blum, Hal Palmer Big Bear Camp 89480 Nelson Mountain Road Walton OR, 97490